

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

SMITHS GROUP, PLC,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 13-cv-00052-DSD-TNL
	)	
RONALD A. FRISBIE,	)	
	)	
Defendant.	)	

**DECLARATION OF RENA BRADHAM**

Rena Bradham, being duly sworn upon oath, states and alleges as follows:

1. I am a current employee of CareFusion, and serve as its Senior Director of Marketing, Connectivity. I have been employed with CareFusion since October 15, 2012. If called as a witness, I would competently testify to the following.

2. In my current role at CareFusion, I am intimately familiar with CareFusion's presence in the infusion pump market in the United States, and the products it offers in this U.S. market. I am responsible for the U.S. Connectivity Marketing team, which includes the marketing of servers, enterprise software and workflow applications for CareFusion's Alaris system, a modular infusion pump system primarily focused on large volume pump capabilities.

3. Prior to working for CareFusion, I was employed by Smiths Medical from February 20, 2006 to October 12, 2012. My most recent position with Smiths Medical was Vice President of Global Product Management for Medication Delivery and Therapeutics, which I held for approximately four years. Prior to that, I served as Smith

Medical's Director of Vital Care for just under one year, and Senior Marketing Manager for Trachestomy for approximately one year. Based on my former roles at Smiths Medical, I am also intimately familiar with Smiths Medical's presence in the U.S. infusion pump market, and the products it offers in that market. In the last year and a half of my employment at Smith Medical, I was responsible for two infusion-based franchises, including Smith Medical's MedFusion syringe pump in the U.S., and its CADD ambulatory pump product on a global basis. In this role, I was responsible for upstream global product management, new product development and stewardship for these products.

4. Infusion pumps are generally used to deliver fluids, blood or medication to a patient intravenously. Based on my experience at both CareFusion and at Smiths Medical, there are three main types of infusion pumps currently being marketed in the medication delivery field:

a. Large Volume Pumps (LVPs), are typically used in health care settings to provide fluids or medications for adults. They require a skilled clinician to operate. LVPs typically use a "bag" holding the fluid or medication that is located above the pump on an IV pole. CareFusion is a major player and market share leader in the LVP market in the United States, with Baxter and Hospira as its major competitors in this market. To the best of my knowledge, Smiths Medical is not actively marketing or actively selling any LVPs in the United States. I am unaware of any overlap between CareFusion's Smart Pump LVP products and any product offered by Smiths Medical in the U.S.

b. Ambulatory Pumps, are infusion pumps that can move with the patient using them. They are typically attached to the patient via a pouch or other apparatus, and allow the medication delivery system to move with the patient. They allow people to go home and participate in daily life activities. Smiths Medical markets and sells standalone ambulatory pumps in the United States. In contrast, CareFusion does not market or sell any similar electronic ambulatory pumps in the United States.

c. Syringe Pumps, which use a syringe as the container and mechanism to deliver medication through the pump, as opposed to a bag and proprietary tubing in the LVPs. Syringe pumps deliver medication more precisely than other infusion pumps. For this reason, syringe pumps are particularly useful with infants, for whom the medication is delivered in smaller volumes and for whom the medication delivery needs to be more precise. Smiths Medical markets and sells a standalone syringe pump under the name "MedFusion." In contrast, CareFusion does not market or sell a standalone syringe pump in the US. CareFusion markets a unique medical delivery and connectivity systems that contain syringe pump capabilities.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 16, 2013



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Rena Bradham